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Communication and Community Partnerships
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Janet Napolitano
Governor

Matthew Burdick
Division Director

Victor M. Mendez
Director

July 17, 2007

Douglas Cole, Chairman
Ahwatukee Foothills Village Planning Committee
City of Phoenix Planning Department
200 West Washington Street, Sixth Floor
Phoenix, Arizona 85003-1611

Ref: SR 202L – South Mountain Freeway

Dear Mr. Cole,

On behalf of Governor Napolitano and Director Victor Mendez, ADOT is responding to the formal comments and questions submitted by the Ahwatukee Foothills Village Planning Committee on May 10, 2007. Some issues cannot be fully addressed prior to public release of the Draft Environmental Impact Statement, which ADOT is completing on behalf of the Federal Highway Administration. However, the agency is committed to active, ongoing public involvement and has responded as fully as possible at this time. This correspondence will be included as a part of the project file.

Following completion of the Federal review of the Administrative Draft EIS, the document will be released to the public for a minimum of 45 days for review and comment; during this time, public hearings will be held to receive formal comments from members of the community and stakeholders. Input from the public and others will be reviewed and may warrant revisions to the draft environmental document before it becomes the Final Environmental Impact Statement.

ADOT is committed to completing a respectful and deliberate review of this proposed freeway. To that end, should an alternative become available in addition to Pecos Road in the eastern section of the proposed alignment, the agency will fully evaluate that alternative prior to the issuance of a Record of Decision. ADOT and the State of Arizona have positive and active relationships with all governmental bodies with a direct interest in this proposed freeway and continue to examine options to address community, economic, environmental and engineering concerns. Nonetheless, the study is advancing to bring resolution as swiftly as possible to this long-standing proposal.

We appreciate the Ahwatukee Foothills Village Planning Committee's continued interest and engagement in the South Mountain Transportation Corridor Study.

Sincerely,

Matthew Burdick
Director, Communications and Community Partnerships

Cc: Victor Mendez, ADOT
Office of Governor Napolitano
Robert Hollis, FHWA



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Response to the Ahwatukee Village Planning Committee
Proposed South Mountain Freeway / Pecos Road (E1) Alternative

Infrastructure Issues

- The cost and process of relocating utilities, such as the private wells along Pecos Road, will depend on the relocation site selected for each adversely affected utility. More detailed cost estimates will be contained as part of the Design Concept Report and further defined in preliminary design. In the case of private wells, ADOT would compensate owners for relocation costs. Cleanup and remediation of any spills during construction, should a build alternative be chosen, will follow standard construction practices. Hazardous material issues will be fully addressed in the Draft Environmental Impact Statement. The Superfund site, located near Interstate 10 in the West Valley, will not be directly adversely affected by construction or operation of this proposed freeway.

Alternative Routes

- The purpose and need of the proposed South Mountain Freeway demonstrates that an access-controlled freeway is required to meet current and future traffic demands of the region; in 2030, if constructed, the South Mountain Freeway is expected to carry between 135,000 and 190,000 vehicles per day in 2030. A parkway, which generally carries 60,000 to 70,000 vehicles per day, does not meet the purpose and need. Improvement to State Route 85, as part of the ADOT/Maricopa Association of Governments (MAG) preferred routing for CANAMEX, are included in the ADOT Five Year Program for construction.
- While enhancements to municipal arterial streets are part of the Regional Transportation Plan approved by voters, capacity improvements to streets in the Ahwatukee area would fail to meet the purpose and need of this proposed freeway. Furthermore, any construction on 51st Avenue, Beltline Road or Riggs Road would require approval of the Gila River Indian Community, based upon an agreement between the Community and the Maricopa County Department of Transportation.

Traffic Issues

- The proposed South Mountain Freeway is not a singular solution to congestion through the Interstate 10 Broadway Curve. Studies are currently being conducted to evaluate options to improve the operational efficiency of I-10 through this area, and to examine options for increasing capacity of the freeway. However, the South Mountain Freeway is considered one element of this solution, providing another route for the traveling public while more directly relieving arterial streets. The existing freeways in the Valley are generally considered inadequate to address *current* peak traffic levels; by 2030, the measurement of Average Daily Trips in the Valley is expected to double.



- It is projected that 75 percent of the traffic which would use the proposed South Mountain Freeway would have origins or destinations within the communities immediately adjacent to the freeway. About 29 percent of vehicles are expected to have an origin/destination in the Southwest Valley, 26 percent in the Southeast Valley, 10 percent in Ahwatukee and 10 percent in the West Valley. Planners estimate that 9 percent of vehicles which would use the proposed South Mountain Freeway would originate or have destinations beyond Maricopa County.
- A full review of hazardous material issues related to this proposed freeway will be included as part of the Draft Environmental Impact Statement. Based upon current guidelines under which ADOT operates federally funded freeways, no restrictions on vehicles carrying hazardous materials are anticipated for the proposed South Mountain Freeway. Hazardous materials restrictions are evaluated on a case-by-case basis; restrictions are made in cases with prevailing rationales. In the Valley, there are three freeway segments on which hazardous materials are restricted. The Deck Park Tunnel segment of I-10, the US 60 ramps to Loop 101 in the East Valley, and the Salt River bridge for Loop 101/Loop 202 are the current locations with restrictions, based on the environmental implications should an incident occur. Pursuant to current guidelines, only roads with a parallel route can be restricted.
- Frontage roads are not included in the scope of this project, as they are not part of the Maricopa Association of Government's framework for new freeway facilities. However, local access will be maintained.
- The Interstate 10 Corridor Improvement Study is currently underway to evaluate opportunities to improve the operations of I-10. Those options may include the addition of travel lanes or new roadway configurations designed to more efficiently move vehicles, based on the environmental and engineering analysis for that corridor. One of the concepts being explored is the use of local and express lanes to improve the efficient movement of traffic, while increasing capacity. The Corridor Improvement Study is evaluating I-10 from State Route 51 to Loop 202. Improvements to I-10, however, will not negate the purpose and need for the proposed South Mountain Freeway.
- The location of traffic interchanges is established in partnership with local governments. In the case of 25th Avenue, the interchange has been removed from consideration based on input from the City of Phoenix. The city has indicated that planned improvements to Chandler Boulevard will facilitate the east-west movement of traffic, supplanting the need for a traffic interchange at 25th Avenue. Deletion of this interchange also reduces the number of homes within the proposed freeway's required right-of-way.
- The 32nd Street traffic interchange has been eliminated from consideration at the request of the City of Phoenix.

Construction Issues

- Traffic management during construction, should a build alternative be selected, will be detailed in the Design Concept Report. As part of the final design process, public meetings will be held to gather input from members of the community specifically related to construction and traffic management. Furthermore, ongoing communication and public involvement opportunities will ensure that members of the traveling public are aware of restrictions or changes in traffic flow, as part of ADOT's commitment to community involvement. ADOT also coordinates with local municipalities to minimize impacts on local streets.
- As with all ADOT projects, the design process will strive for a balance of produced and needed earthen material. While the balance of earth material is a factor in the profile evaluations of a proposed freeway, residential impacts are the prevailing consideration. Other factors include drainage and wildlife connections when assessing whether to construct a freeway at, below or above grade (ground) level.



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Alignment Issues

- As part of the alignment selection process for the western connection of the proposed South Mountain Freeway, operational and other impacts to Interstate 10 were assessed. Indeed, capacity and operational improvements will be made to facilitate a functional, sustainable connection between I-10 and Loop 202 (South Mountain Freeway). MAG traffic analysis supports the location of the West Valley connection at 55th Avenue (W55 Alternative): it is estimated that when fully operational, 55 percent of South Mountain Freeway traffic would be to/from the west with the remaining 45 percent to/from the east/downtown. While other western connections were considered, and are fully evaluated in the Draft Environmental Impact Statement, the W55 Alternative (designated as the preliminary preferred alternative), is optimal from freeway and system operational perspectives and is consistent with long-established urban planning for the region, resulting in fewer potential residential displacements. In evaluating all freeway connections, planners take a system-wide view to balance traffic demands and maximize operational efficiencies. In the case of the western alignment alternative for the proposed South Mountain Freeway, ADOT and FHWA considered impacts to the proposed State Route 801 (I-10 Reliever), Loop 303 and Loop 101. For the eastern section, only one build option will be fully reviewed in the Draft Environmental Impact Statement; while other eastern alignments were initially considered, all were either on the Gila River Indian Community and/or had increased impacts to the community. In all, more than 30 total alignment alternatives have been studied.
- While the South Mountain Freeway has been proposed for nearly 20 years, this current process is a new study to evaluate the purpose and need for such a roadway, and evaluate possible alternatives for construction. While the purpose and need will be fully addressed in the Draft Environmental Impact Statement, ADOT, MAG and FHWA believe this proposed freeway is needed to meet current and future traffic demands of the region. However, the proposed South Mountain Freeway is not a singular solution – additional long-range planning for multi-modal transportation solutions is needed to address the growth of the region, including an expected 500,000 residents in northern Pinal County and 3 million community members in Hidden Valley. Current freeways are unable to appropriately handle peak-traffic demand in the Valley; new freeways, like the proposed South Mountain Freeway, are necessary to address demand today and into the future. MAG, as the regional transportation planning agency, and ADOT as the plan implementer are currently working on these long-range plans that move beyond current-day needs.
- There is not a definite date on when the final alignment of the proposed South Mountain Freeway will be selected. However, it is estimated that the Draft Environmental Impact Statement will be released for public review and comment in 2008, with a final decision on alignment and build/no-build expected in late 2008.
- ADOT is not a land-use or urban planning organization and as such has no authority to prohibit or restrict development on private land. ADOT works in partnership with local governments to establish, maintain and protect future freeway corridors to reduce impacts to residents, businesses and taxpayers. While the 55th Avenue and Pecos Road alignments have been identified as freeway alternatives for nearly 20 years, such declarations do not prohibit land owners from building on their property. A shortfall in funds from the 1985 voter-approved transportation plan prohibited full right-of-way acquisition, although ADOT has continued to evaluate acquisition requests on a case-by-case basis. ADOT has acquired a number of properties, including homes along Pecos Road, through an early acquisition process. Acquisition of right-of-way will begin in earnest, if a build alternative is approved, as early as 2009.

South Mountain Park Issues

- As part of the Draft Environmental Impact Statement, ADOT is required to evaluate a range of reasonable alternatives. With regard to certain environmental resources such as South Mountain Park/Preserve, ADOT is required to study practical and feasible alternatives to avoid impact. If avoidance is not possible then efforts need to be made to minimize harm to these types of resources. The environmental



documentation will review options for a build alternative, such as cuts through three mountains ridges, tunneling or constructing a bridge structure over the ridges. In all, the proposed South Mountain Freeway has the potential to directly affect 32 acres of the 16,000-acre South Mountain Regional Park (about 0.2 percent). At this time, there are no alternatives which will permit for avoidance of impacts to the park or mountain peaks. All options – cuts, tunnel or bridge structure – will have impacts on the mountain and park; an engineering and environmental analysis will identify the practical and feasible options, as part of any build alternative.

HOA Issues

- As part of the right-of-way acquisition process, ADOT appraises the rights of homeowners' associations. ADOT is in the process of evaluating individual CC&Rs of potentially adversely affected residences and will proceed based on those covenants. In some instances, based on the CC&Rs, ADOT may compensate HOAs for the loss of a residential parcel. Until this issue is fully addressed during the right-of-way acquisition process for a build alternative, ADOT will continue to pay HOA dues for already-acquired residences.

Financial Issues

- A detailed assessment of the financial implications of the build alternatives will be unknown until preparation of the Design Concept Report is complete. The Draft Environmental Impact Statement will review potential construction impacts, purpose and need, right-of-way acquisition, tax base/economic analysis, travel time, impacts to public parks/recreation areas, planning level cost estimates, etc. MAG, as the designated transportation planning agency for Maricopa County, prioritizes projects which are part of the voter-approved Regional Transportation Plan. The 2004 election designated more than \$1 billion (in 2004 dollars) for construction of the South Mountain Freeway portion of Loop 202, although MAG can modify allocations to meet current construction estimates. Ultimately, if a build alternative is approved, MAG will decide whether or not to fund the proposed freeway based upon a full review of documentation.

Facility Amenities Issues

- Should a build alternative be selected, design amenities for a proposed freeway are addressed in collaboration with municipal leadership and community members during the project's 30 percent design stage. Like amenities, aesthetics of a freeway are established in close collaboration with communities and cities. Placement and design of sound mitigation walls will also be addressed through the design process, as will potential trails. At this time, however, ADOT has committed to rubberized asphalt overlay.
- While the South Mountain Freeway has funding available for construction as a six-lane roadway, ADOT designs all new freeways to accommodate the "ultimate" potential build out. Like other newly constructed freeways in the Valley which have only six lanes, the South Mountain Freeway would be constructed to more easily facilitate future expansion, should funding and need emerge. By establishing the "ultimate" footprint of a new freeway during initial construction, ADOT and regional planners can reduce the potential for future right-of-way conflicts. Through the 20-year Regional Transportation Plan, the South Mountain Freeway is funded for construction only as a six lane roadway; yet if the freeway is built, it will have a right-of-way width to accommodate an additional two lanes in each direction.

Environmental Issues

- The Draft Environmental Impact Statement will evaluate the affects, both short and long term, of the build and no-build alternatives. There are currently no plans to conduct “annual, independent environmental analysis of the area” following construction, should a build alternative be chosen.
- ADOT will provide for residential sound testing, based on established policy, and will return to assess the need for additional mitigation, should the proposed freeway be constructed.
- Flood control and drainage will be addressed as part of the freeway design, respecting that regulations require that current flows must be maintained to the Gila River Indian Community.
- ADOT will examine air quality, including Mobile Source Air Toxics, as part of the Draft Environmental Impact Statement and pursuant to the provisions set forth in the Clean Air Act and related guidance, including additional EPA and FHWA guidance on Mobile Source Air Toxics.
- The two weather monitoring stations were removed in late May and ADOT expects to soon receive the data. Once received, this data will be analyzed and made available to the community for review as a technical report.

Safety Issues

- In 2005, Phoenix Police Department staff met with members of the community to discuss the relationship between crime and freeways. In this meeting, police representatives indicated that crime patterns are influenced by a variety of factors and it would be difficult to determine whether or not a new freeway had any affects. Based on the experiences of the presenters, there did not appear to be a correlation between crime rates and freeways; the Police Department, however, did not have any statistics specific to crimes adjacent to freeways. It was noted that criminal suspects who use freeways to flee authorities are typically the easiest for officers to apprehend. Finally, it was stated that crime seems to be more related to what is built adjacent to a freeway.

GRIC Issues

- The Arizona Department of Transportation has a positive relationship with the leadership of the Gila River Indian Community. ADOT and GRIC continue to discuss a range of regional transportation-related issues. The formal position of the Tribal Government, however, has not changed.

Miscellaneous Comments/Issues

- Because any new freeway has impacts to the environment and communities, litigation is always a possibility. If a lawsuit is filed against the Federal Highway Administration based on the Final Environmental Impact Statement, the immediate and long-term impacts will be determined by attorneys for ADOT/FHWA and the Courts.
- While the U.S. Post Office on Desert Foothills Parkway is not within the right-of-way for the proposed South Mountain Freeway, assuming an at-grade construction, the postal facility would be within the freeway’s control of access, which may alter how traffic can enter or exit the facility. These issues will be further explored in the Design Concept Report.
- A 22-mile new freeway will affect neighborhoods, residents and the environment. These impacts may be both positive and negative. The purpose of the Environmental Impact Statement is to evaluate the impacts and the benefits of the proposed roadway, along with how the proposed action meets the current and future needs of the region. The no-action alternative, where no freeway is constructed, would also have impacts which are evaluated equally in the Environmental Impact Statement.